

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NO. LISTED ON THE ATTACHED EXHIBIT:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiff in the case listed on the attached Exhibit A and defendant American Medical Systems, Inc. ("AMS") advise the Court that they have compromised and settled all claims between them in this action, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiff and AMS jointly move the court to dismiss AMS as a defendant in this action with prejudice, and terminate AMS from the docket in the action, parties to bear their own costs. Other defendants remain in this action, and plaintiff will continue to prosecute her action against them.

Respectfully:

/s/Barbara R. Binis
Barbara R. Binis
REED SMITH
Three Logan Square, Suite 3100
1717 Arch Street
Philadelphia, PA 19103
215.851.8100 (phone)
215.851.1420 (fax)
bbinis@reedsmith.com
*Attorney for Defendant American Medical
Systems, Inc.*

/s/ Andy Dow Birchfield, Jr.
Andy Dow Birchfield, Jr.
BEASLEY ALLEN CROW METHVIN
PORTIS & MILES
P. O. Box 4160
Montgomery, AL 36103-4160
334.269.2343 (phone)
334.954.7555 (fax)
andy.birchfield@beasleyallen.com
Attorney for Plaintiffs on Exhibit A

Dated: October 16, 2015

EXHIBIT A - BEASLEY ALLEN CROW METHVIN PORTIS & MILES

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-cv-04258	Pamela Ann Sullivan v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this member case.

/s/Barbara R. Binis